

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 19 through 21, all newly-presented, are pending, with Claims 19 and 21 being independent. Claims 1 and 3 through 18 have been cancelled without prejudice.

Claims 1 and 3 through 18 were rejected under 35 U.S.C. § 103 over US 7,302,696 B1 (Yamamoto) in view of US 5,909,673 (Gregory), US 2003/0101451 A1 (Bentolila, et al.), WO 01/65852 A1 (“WO ‘852”; the Official Action refers to US2003/0023968 A1 (Nishi, et al.) for citations), and US 5,285,278 (Holman), with all but the latter being newly-cited. All rejections are respectfully traversed.

Claims 19 and 21 variously recite, *inter alia*, that the print content is constructed in a mark-up language and the processing unit (Claim 19) or step (Claim 21) rewrites text data relating to the sub-print content in the mark-up language to text data relating to the selected sub-print content (with sub-print content as claimed).

However, Applicants respectfully submit that none of the applied documents, even in the proposed combinations, assuming, *arguendo*, that such could be combined, discloses or suggests at least the above-discussed claimed features as recited, *inter alia*, in Claims 19 and 21.

The Official Action relies upon Yamamoto for showing, e.g., a correlation between user-related data 1702 and coupon data 1704 to, for example, find entries that match the geographic location of the user (e.g., col. 11), but the Official Action states that Yamamoto lacks sub-print content as claimed.

The Official Action relies upon the Official Action relies upon WO '852 for showing, e.g., that the coupon discount rate varies based on the display state history information, and upon Bentolila, et al. for showing the time when a user started watching a program, but Applicants submit that these documents fail to remedy Yamamoto's deficiencies.

And the Official Action relies upon Gregory for showing site specific coupons and templates; however, Applicants respectfully submit that Gregory too is silent as to the above-discussed claimed features, which require, *inter alia*, rewriting as claimed.

Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at such claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Daniel S. Glueck/

Daniel S. Glueck

Attorney for Applicants

Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO

30 Rockefeller Plaza

New York, New York 10112-3800

Facsimile: (212) 218-2200

DSG:jjr

FCHS_WS 3472844v1